

MOTION INFORMATION STATEMENT

Docket Number(s): 16-1563

Caption [use short title]

Motion for: Briefing schedule for defendant's seeking permission for leave to file interlocutory appeal.

Halberstam v. Global Credit & Collection Corp.

Set forth below precise, complete statement of relief sought:

Being that the parties were in the unique circumstance that the defendant/appellant filed a motion for permission to appeal and plaintiff /appellee filed a motion for reconsideration, we took the position that defendant's appeal should be dismissed or stayed pending the motion. Judge Cogan denied the motion for reconsideration so we are now seeking a briefing schedule to oppose defendant's motion with plaintiff requesting 30 days.

MOVING PARTY: Herschel Halberstam

Plaintiff Defendant
 Appellant/Petitioner Appellee/Respondent

OPPOSING PARTY: Global Credit & Collection Corp.MOVING ATTORNEY: Adam J. Fishbein

[name of attorney, with firm, address, phone number and e-mail]

Adam J. Fishbein, Adam J. Fishbein, P.C.483 Chestnut Street Cedarhurst NY 11516516 791 4400 fishbeindadamj@gmail.comOPPOSING ATTORNEY: Bradley J. LevienMintzer Sarowitz Zeris Ledva & Meyers, LLP17 West John Street Suite 200 | Hicksville NY 11801Tel 516.939.9200 BLevien@DefenseCounsel.comCourt-Judge/Agency appealed from: Judge Cogan Eastern District of New York

Please check appropriate boxes:

Has movant notified opposing counsel (required by Local Rule 27.1):

 Yes No (explain): _____

FOR EMERGENCY MOTIONS, MOTIONS FOR STAYS AND INJUNCTIONS PENDING APPEAL:

Yes No
 Yes No

Has request for relief been made below?

Has this relief been previously sought in this Court?

Requested return date and explanation of emergency: _____

Opposing counsel's position on motion:

 Unopposed Opposed Don't Know

Does opposing counsel intend to file a response:

 Yes No Don't Know

Is oral argument on motion requested?

 Yes No (requests for oral argument will not necessarily be granted)

Has argument date of appeal been set?

 Yes No If yes, enter date: _____

Signature of Moving Attorney:

 Date: July 25, 2016Service by: CM/ECF Other [Attach proof of service]